

BECKER & POLIAKOFF LLP

Helen Davis Chaitman HCHAITMAN@BPLEGAL.COM

Peter W. Smith PSMITH@BPLEGAL.COM

Julie Gorchkova JGORCHKOVA@BPLEGAL.COM

45 Broadway

New York, New York 10006

Telephone (212) 599-3322

Facsimile (212) 557-0295

Attorneys for Defendant

Sharon Popkin Andersen

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

JOSEPH S. POPKIN REVOCABLE TRUST
DATED FEBRUARY 9, 2006, a Florida trust,
ESTATE OF JOSEPH S. POPKIN, ROBIN POPKIN
LOGUE, as trustee of the Joseph S. Popkin
Revocable Trust Dated February 9, 2006, as the
personal representative of the Estate of Joseph S.
Popkin, and as an individual, SHARON POPKIN,
and MARK POPKIN,

Defendants.

Adv. Pro. No. 10-04712 (SMB)

STIPULATION

Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, by and through his counsel and Defendant Sharon Popkin Andersen (the “Defendant”), hereby stipulate and agree as follows:

1. The Defendant joins in the motion to dismiss filed by Becker & Poliakoff, LLP on October 31, 2014 and all accompanying papers on the same grounds described therein, and also joins in and adopts the arguments asserted in all of the other pending motions to dismiss filed in the innocent investor BLMIS adversary proceedings listed in Appendix A to the Trustee’s February 20, 2014 letter [Case No.: 08-01789, Doc. 5678] (collectively, the “Motions”).

2. This stipulation shall be deemed as the Defendant’s joinder in the Motions.

3. The Defendant shall be bound by the decision(s) rendered on the Motions.

Dated: December 11, 2014
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Michael Matthias
Michael Matthias
mmatthias@bakerlaw.com

11601 Wilshire Blvd., Ste. 1400
Los Angeles, CA 90025
Telephone: (310) 442-8802
Facsimile: (310) 820-8859

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

BECKER & POLIAKOFF P.A.

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman
hchaitman@bplegal.com
Peter Smith
psmith@becker-poliakoff.com
Julie Gorchkova
jgorchkova@becker-poliakoff.com

45 Broadway
New York, New York 10006
Telephone: (212) 599-3322
Facsimile: (212) 557-0295
Attorneys for Sharon Popkin Andersen

CERTIFICATE OF SERVICE

I, Lourdes Blanco, hereby certify that I caused a true and correct copy of the foregoing document(s) to be served upon the parties in this action who receive electronic service through CM/ECF. I certify under penalty of perjury that the foregoing is true and correct.

Dated: December 16, 2014

/s/ Lourdes Blanco